

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: Methyl *tertiary* Butyl Ether ("MtBE")  
Products Liability Litigation

Master File No. 1:00-1898  
MDL No. 1358 (SAS)

This Document Relates To:

*Orange County Water District v. Unocal  
Corporation, et al.,*  
Case No. 04 Civ. 4968 (SAS)

**Declaration of Jeremiah J. Anderson in Support of Defendants' Reply  
the Orange County Water District's Response to Show Cause Order**

**Declaration of Jeremiah J. Anderson**

I, Jeremiah J. Anderson, hereby declare:

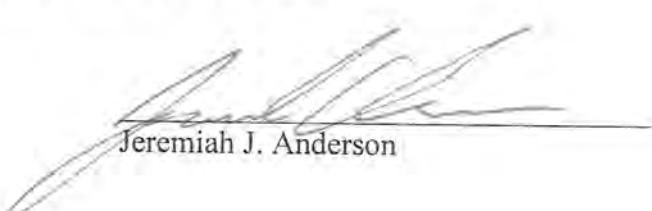
1. I am a member of the bar of the State of Texas and an associate in the law firm of King & Spalding, LLP, counsel of record for Defendants Chevron U.S.A. Inc., Chevron Corporation, Unocal Corporation, and Union Oil Company of California in this litigation. I make this Declaration in support of Defendants' Reply to the Orange County Water District's (the "District") Response the Court's June 20, 2011 Show Cause Order. During the course of this litigation, I have actively participated in pretrial matters, including discovery and document review. This Declaration is based on my personal knowledge and, if called as a witness, I could testify competently thereto.

2. Plaintiff Orange County Water District ("OCWD") has not produced an expert report from Mr. Roy Herndon nor sought an extension to do so.

3. The District has made three supplemental document productions related to the work that Hargis + Associates, Inc. has performed for the District related to the focus plume sites (April 28, 2011, May 17, 2011, and June 7, 2011). The District has not supplemented its interrogatory responses to reflect the work Hargis performed.

I declare under penalty of perjury that the foregoing is true and correct.

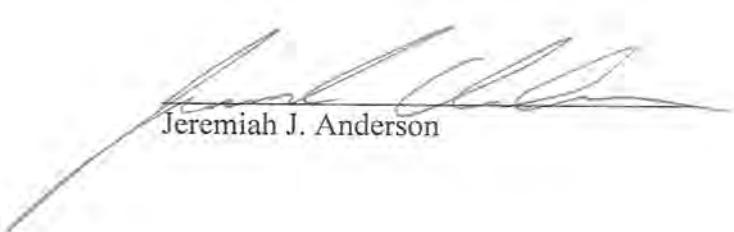
Executed at Houston, Texas on this 8th day of August, 2011.



Jeremiah J. Anderson

**Certificate of Service**

I hereby certify that on August 8th, 2011 a true, correct, and exact copy of the foregoing document was served on all counsel via LexisNexis File & Serve.



Jeremiah J. Anderson